

EXHIBIT 19

From: [Smith, K'Shaani \(CRT\)](#)
To: [Michael Rosman](#); [Michelle Scott](#)
Cc: [Braniff, Andrew \(CRT\)](#); [Gray, Juliet \(CRT\)](#); [Dinan, Christine \(CRT\)](#); [Crawford, Cecily \(CRT\)](#); [Dale Conder](#)
Subject: Ultima--30(b)(6) Depositions
Date: Friday, April 1, 2022 4:33:14 PM

Hi Michael,

We are writing to inform you of the designees for the SBA and USDA 30(b)(6) depositions.

SBA has designated John Klein, Acting Deputy General Counsel and Associate General Counsel for Procurement Law for the SBA, to testify about each of the noticed topics. USDA has designated the following deponents to testify regarding the noticed topics as specified:

- Tiffany Taylor, Director of the USDA Office of Contracting and Procurement
 - Topics: 1, 2, 9, 12
- Heidi Atkinson, Branch Chief of the Policy, Accountability, and Oversight Branch Acquisitions Division at FPAC Business Center
 - Topics: 3, 4, 5, 7, 11
- Michelle Warren, Acting Director of the USDA Office of Small and Disadvantaged Business Utilization
 - Topics: 6, 8, 10

Due to travel and vacation plans, deponents will not be available during the week of April 11. However, they will be available the week of April 18. Every day other than April 19 will work for us. Also, would you be open to scheduling multiple depositions in one day? For instance, Tiffany Taylor and Michelle Warren may be able to testify on the same day.

Further, as agreed during our call on March 23, could you let us know what information that the plaintiff is seeking regarding USDA Topic 11 with more particularity? Also, as decided during the call, could you let us know which former employees you would like contact information for and provide a particularized list of the relevant information you would like these former employees to speak to?

Please let us know if you have any questions or concerns, or if you would like to schedule a call to discuss.

Best,
K'Shaani

K'Shaani Smith
Pronouns: she/her
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Department of Justice
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Employment Litigation Section
(202) 598-6856 - cell

From: [Smith, K'Shaani \(CRT\)](#)
To: [Michelle Scott](#)
Cc: [Michael Rosman](#); [Braniff, Andrew \(CRT\)](#); [Gray, Juliet \(CRT\)](#); [Dinan, Christine \(CRT\)](#); [Crawford, Cecily \(CRT\)](#); [Dale Conder](#)
Subject: RE: Ultima--30(b)(6) Depositions
Date: Monday, April 11, 2022 6:12:19 PM

Hi Michelle,

John Klein would be available on Monday, April 18 and Heidi Atkinson on Wednesday, April 20, if that works. Additionally, we would prefer to have Mr. Klein's deposition taken remotely.

Further, we have made the following adjustments to the USDA deponents' designated topics:

- Tiffany Taylor, Director of the USDA Office of Contracting and Procurement
 - Topics: 1, 2, 8, 9, 12
- Heidi Atkinson, Branch Chief of the Policy, Accountability, and Oversight Branch Acquisitions Division at FPAC Business Center
 - Topics: 3, 4, 5, 6, 7, 11
- Michelle Warren, Acting Director of the USDA Office of Small and Disadvantaged Business Utilization
 - Topics: 8, 10

We look forward to getting more particularized information regarding what the plaintiff is seeking regarding USDA Topic 11 and a particularized list of the relevant information you would like SBA and USDA former employees to speak to.

Thanks,
K'Shaani

K'Shaani Smith

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From: Michelle Scott <Scott@cir-usa.org>
Sent: Wednesday, April 6, 2022 2:03 PM
To: Smith, K'Shaani (CRT) <K'Shaani.Smith@usdoj.gov>
Cc: Michael Rosman <Rosman@cir-usa.org>; Braniff, Andrew (CRT) <Andrew.Braniff@usdoj.gov>; Gray, Juliet (CRT) <Juliet.Gray@usdoj.gov>; Dinan, Christine (CRT) <Christine.Dinan@usdoj.gov>; Crawford, Cecily (CRT) <Cecily.Crawford2@usdoj.gov>; Dale Conder <dconder@raineykizer.com>
Subject: [EXTERNAL] Ultima--30(b)(6) Depositions

Additionally, I neglected to mention that if the schedule set out below is acceptable to defendants, we will move the deposition of DOJ to the following week.

Thank you,